

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON
a/k/a DAVID GILBERT and
CIRCLE SOCIETY, CORP.,

Defendants.

Case No. 2:19-cv-1697-JAD-DJA

[PROPOSED] ORDER IMPOSING MONETARY SANCTIONS

The Court has reviewed “Plaintiff CFTC’s Notice of Defendants’ Non-Compliance with the Civil Contempt Order,” including the Declaration of Danielle E. Karst and accompanying exhibits [ECF No. 58].

The Court finds, by clear and convincing evidence, that Defendants David Gilbert Saffron (“Saffron”) and Circle Society, Corp. (“Circle Society”) have willfully failed to comply with the Civil Contempt Order [ECF No. 51]. The Court further finds, by clear and convincing evidence, that the following coercive sanctions, referred to in the Contempt Order, are necessary and the following Defendants therefore are ORDERED to pay them:

1. Saffron shall pay to the District Court a daily compliance fine of \$1,000 per day, beginning on February 8, 2020, and lasting until such time as Saffron has purged his contempt or the Court orders otherwise. Any compliance fine due on a day when the court is closed, e.g., weekend or federal holiday, must be paid on the next day that the Court is open to the public.
2. Circle Society shall pay to the District Court a daily compliance fine of \$1,000 per day, beginning on February 8, 2020, and lasting until such time as Circle Society has purged its contempt or the Court orders otherwise. Any compliance fine due on a day when the court is closed, e.g., weekend or federal holiday, must be paid on the next day that the Court is open to the public.

1 If, thereafter, either of them fail to comply with the terms and conditions of the Civil
2 Contempt Order, including their individual obligations to pay a \$1,000 daily compliance fine, the
3 Court will entertain a motion or application from the CFTC to impose additional coercive
4 sanctions against Defendants, including for an arrest warrant or other comparable remedy.

5 **IT SO ORDERED:**

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UNITED STATES DISTRICT JUDGE

8 DATED: _____
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